

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

J.B. INTERNATIONAL, LLC d/b/a
J. BIRNBACH,

Plaintiff,

v.

WILLIAM NOBLE RARE JEWELS, L.P.,
and WILLIAM NOBLE,

Defendants.

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Civil Action No. 3:22-cv-01422

DEFENDANTS' WITNESS LIST FOR TRIAL

Pursuant to the Court's Scheduling Order, Doc. No. 27, and FED. R. CIV. P. 26(a)(3)(A)-(B) Defendants William Noble Rare Jewels, L.P. ("**WNRJ**") and William "Bill" Noble (collectively, "**Defendants**") and hereby submit this, their Witness List for the January 16, 2024 trial in this matter.

I. PROBABLE WITNESSES

Witness Name	Address	Brief Narrative of Testimony	Expected Length
Jonathan Birnbach	c/o Kaminski Law, PLLC Shanna M. Kaminski P.O. Box. 725220 Berkley, MI 48072 (248) 462-7111	Mr. Birnbach is expected to testify regarding the business dealings between the parties and his alleged damages.	4-5 hours
William "Bill" Noble	c/o CRAWFORD, WISHNEW & LANG PLLC Trey Crawford 1700 Pacific Avenue, Suite 2390 Dallas, Texas 75201 Telephone: (214) 817-4500 Facsimile: (214) 602-6551	Mr. Noble is expected to testify regarding the business dealings between the parties. He will testify in his capacity both individually and as a corporate representative of WNRJ.	4-5 hours
Trey Crawford	c/o CRAWFORD, WISHNEW & LANG PLLC Trey Crawford 1700 Pacific Avenue, Suite 2390 Dallas, Texas 75201	Mr. Crawford is expected to testify regarding reasonable and necessary attorney's fees.	15 minutes

	Telephone: (214) 817-4500 Facsimile: (214) 602-6551		
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II. POSSIBLE WITNESSES

Witness Name	Address	Brief Narrative of Testimony	Expected Length
Jeffrey A. Mitchell	Unknown (will supplement if able)	Mr. Mitchell is expected to testify regarding the terms of the Letter Agreement.	2-3 hours
Trey Crawford	c/o CRAWFORD, WISHNEW & LANG PLLC Trey Crawford 1700 Pacific Avenue, Suite 2390 Dallas, Texas 75201 Telephone: (214) 817-4500 Facsimile: (214) 602-6551	Mr. Crawford is expected to testify regarding reasonable and necessary attorney's fees.	15 minutes

III. EXPERT WITNESS

Witness Name	Address	Brief Narrative of Testimony	Expected Length
Trey Crawford	c/o CRAWFORD, WISHNEW & LANG PLLC Trey Crawford 1700 Pacific Avenue, Suite 2390 Dallas, Texas 75201 Telephone: (214) 817-4500 Facsimile: (214) 602-6551	Mr. Crawford is expected to testify regarding reasonable and necessary attorney's fees.	15 minutes

IV. RECORD CUSTODIANS

Witness Name	Address	Brief Narrative of Testimony	Expected Length
William "Bill" Noble	c/o CRAWFORD, WISHNEW & LANG PLLC Trey Crawford 1700 Pacific Avenue, Suite 2390 Dallas, Texas 75201 Telephone: (214) 817-4500 Facsimile: (214) 602-6551	Mr. Noble is expected to testify regarding the business dealings between the parties. He will testify in his capacity both individually and as a corporate representative of WNRJ.	4-5 hours

Defendants hereby cross-designate any and all individuals and/or entities designated by Plaintiff in Plaintiff's Witness List(s), whether in Plaintiff's case-in-chief or in rebuttal. Defendants reserve the right to call witnesses in rebuttal. Defendants reserve the right to supplement or amend their Witness List, up to and during Trial.

Dated: December 8, 2023

Respectfully submitted,

/s/ Trey Crawford

Trey Crawford

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(214) 602-6551 Fax

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2023, a true and correct copy of the foregoing document was forwarded to all counsel of record pursuant to the Federal Rules of Civil Procedure.

/s/ Trey Crawford

Trey Crawford